

UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA )  
                               ) NO. 19-MJ-4307  
v.                             )  
                               ) JUDGE NEWBERN  
                               )  
XU ZHANG                     )

**MOTION FOR DETENTION**

Pursuant to Title 18, United States Code, Section 3142(f), the United States moves to have the defendant detained pending proceedings in this matter. Under Title 18, United States Code, Section 3142(f)(2), the United States is entitled to seek detention of the defendant until the time of trial. The United States seeks detention on the grounds that the defendant poses a serious risk of flight and a serious risk that he will obstruct justice.

In support, the United States argues the following: (1) the defendant has overstayed his visa, travels frequently, does not have any known local ties or a local address, has a New York driver's license, has changed his phone number at least once in the past two months, and admitted on a recorded jail call with an incarcerated coconspirator, Gao Xing, that he could go back to China any time and take her as well; and (2) the defendant has already demonstrated his willingness to obstruct justice as evidenced by his admitted destruction of Gao Xing's WeChat conversations that Xing had informed the defendant were relevant to her federal criminal case.

In consideration of the above, the United States asserts that the defendant poses a serious risk of flight and a serious risk that he will obstruct justice. The United States requests a continuance of three days to hold a hearing on those issues.

Respectfully submitted,

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